LAW OFFICE OF

EVAN L. LIPTON

ELL@evanliptonlaw.com Tel / Text (917) 924-9800

250 West 55th Street, Floor 30 New York, New York 10019

April 18, 2023

BY ECF

Hon. Colleen McMahon Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

> Re: United States v. Gary Brown et al, 22 Cr. 82 (CM)

Dear Judge McMahon:

I represent Gary Brown in the above-referenced matter. Mr. Brown is presently on pretrial release with travel restricted to the Southern District of New York and the District of New Jersey. I respectfully request that these geographic restrictions be amended to incorporate the District of Connecticut. Both the government (A.U.S.A. Nicholas) and Pretrial Services (Officer Cosme) consent to this application.

Respectfully yours,

Evan L. Lipton

Counsel for Gary Brown

MEMO ENDORSED

Cc: Ashley Nicholas

Assistant United States Attorney

Ashley Cosme, Izlia Sanchez Pretrial Services

4 (18/23 SO Ordered Gellen hu Mod

USDC SDNY DOCUMENT ELECTRONICALLY FILED